UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF OHIO WESTERN DIVISION

Case No. No. C-1-01-210 DARLINGTON AMADASU,

> Plaintiff, Judge Dlott

Magistrate Judge Black v.

JAMES R. DONOVAN, M.D., et al.,

Defendants.

DECLARATION OF JUSTIN D. FLAMM

Justin D. Flamm declares as follows of his own personal knowledge:

- I am counsel for the University of Cincinnati and the other Ohio Defendants in 1. this action.
- 2. On January 21, 2005, I met with Plaintiff Darlington Amadasu at our firm's offices so he could begin reviewing documents that the Ohio Defendants were producing in discovery. Mr. Amadasu marked various documents for copying, and I sent those documents to him the following week.
- Exhibits 26 and 27 to Mr. Amadasu's May 27, 2005 Declaration -- which purport 3. to be letters from Dr. James Donovan to Mr. Amadasu dated December 20, 1999 and May 31, 2000 -- were not among the documents made available to Mr. Amadasu or the documents sent to him. The first time I ever saw these documents was when Mr. Amadasu submitted them to the Court with his May 27, 2005 Declaration.

I declare under penalty of perjury that the foregoing is true and correct. Executed on August 18, 2005.